



## *Sociedad Nacional de Agricultura*

S.62

Docket Clerk  
Marketing Order Administration Branch  
Fruit and Vegetable Programs  
AMS, USDA  
1400 Independence Avenue, SW  
STOP 0237  
Washington, DC 20250-0237

FAX (202) 720-8938  
E-MAIL [moab.docketclerk@usda.gov](mailto:moab.docketclerk@usda.gov)  
INTERNET <http://www.regulations.gov>

RE: Docket No. FV03-925-1PR  
Federal Register Vol.70, No. 100, Page 30001  
Grapes Grown in a Designated Area of Southeastern California and Imported  
Table Grapes; Proposed Change in Regulatory Period  
**COMMENTS IN OPPOSITION TO PROPOSED CHANGE**

Dear Docket Clerk:

Sociedad Nacional de Agricultura opposes the above referenced change in the dates for Table Grape Marketing Order 925 and Import Regulation 4 that will further restrict table grapes supplied from Chile. Sociedad Nacional de Agricultura is a trade association which represents agro-businesses in Chile. We have membership over 3,400, of which 500 are involved in export of fresh table grapes out of Chile that are members through the fruit organizations affiliated to our institution.

Sociedad Nacional de Agricultura concurs with, and incorporates herein by reference, the detailed comments and supporting data submitted by ASOEX, the Chilean Exporters Association. Specifically, Sociedad Nacional de Agricultura urges the agency to reject the proposed change in the regulatory period because it will unfairly restrict trade with a developing country that is committed to providing fair wages and good employment opportunities and dedicated to protecting the environment. In addition:

1. The proposed rule which imposes the marketing order standards on the Chilean supplies when no domestic varieties are available constitutes a non-tariff barrier contrary to the terms of WTO Agreements and the U.S.-Chile Free Trade Agreement.
2. The proposed rule, which assesses inspection fees starting April 1 when no domestic supplies are being so charged, is in contravention of Article III and Article VIII of GATT 1994.



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3. The record submissions for the proposed rule do not support the proposed changes in the beginning and ending effective date of Marketing Order 925 and the companion Table Grape Import Regulation 4.
4. The proposed change in the beginning effective date of Marketing Order 925 and Table Grape Import Regulation 4 from April 20 to April 1 will deprive U.S. consumers of supply of fresh table grapes during a period when there is no other commercially significant and reliable supply from any source other than Chile.

Respectfully submitted,



Luis Schmidt M.  
President

Sociedad Nacional de Agricultura